

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

JAMSHID NORYIAN (1)

a.k.a JAMES NORYIAN

DEHSHID NOURIAN (2)

a.k.a DAVID NOURIAN

CHRISTOPHER RYDBERG (3)

MICHAEL TABA (7)

NO. 3:17-cr-00155-L

**DEFENDANT JAMSHID NORYIAN'S MOTION TO MODIFY
CONDITIONS OF RELEASE**

Defendant Jamshid “James” Noryian through undersigned counsel files this Motion to Modify Conditions of Release. Defendant requests this Court modify his conditions of release to authorize travel within the continental United States with notice to Pretrial Services without seeking permission from this Court. In support of said motion, the Defendant would show the Court as follows:

I.

The Defendant was released by United States Magistrate Irma Carrillo Ramirez for the Northern District of Texas on March 24, 2017. Defendant’s Conditions of Release specifically restricted the Defendant’s travel to the State of Texas (doc 13).

II.

The Defendant has met all conditions of release since March 24, 2017 to the present date—almost six years.

III.

The Defendant requests this Court modify his conditions of release to authorize travel within the continental United States with notice to Pretrial Services without seeking permission from this Court.

IV.

The Government defers to Pretrial Services' recommendation on this motion.

Accordingly, Defendant requests this Court grant this motion and enter an order modifying Defendant's conditions of release to authorize travel within the continental United States with notice to Pretrial Services without seeking permission from this Court.

Respectfully submitted,

/s/ Jeff Kearney

JEFF KEARNEY

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CERTIFICATE OF CONFERENCE

I hereby certify undersigned counsel conferred with Carlos Lopez, Attorney of record for the Government who stated the Government defers to Pretrial Services' recommendation on this motion.

/s/ _____
JEFF KEARNEY

CERTIFICATE OF SERVICE

I hereby certify this Motion was electronically filed, and Assistant United States Ethan Womble and Carlos Lopez was electronically served via this Court's Electronic Filing System on the day of filing.

/s/ _____
JEFF KEARNEY